

Application no.: 09/592,079  
Response date: July 2, 2004  
Reply to Office Action of April 2, 2004

## REMARKS / ARGUMENT

### A. INTRODUCTION

In the office action dated April 2, 2003, claims 1-16 were rejected:

claims 1-5, 9-13 were rejected under 103(a) as being unpatentable over US Patent No. 5,758,083 to Singh ("Singh") in view of cited reference to Lee et al.; and  
claim 6-7, 14-15 were rejected under 103(a) in view of Singh in view of U.S Patent No. 6,480,595 to Hamano ("Hamano") and US patent no. 6,466,941 to Rowe et al. ("Rowe").

### B. CLAIMS 1, 7-9, 15-16 ARE PATENTLY DISTINGUISHABLE

Claim 1 has been amended to include the features of prior claims 5 and 6 to clarify the invention. Claim 9 has also been amended to include the features of prior claims 13 and 14 to clarify the invention.

Applicant submits that amended claims 1 and 9 of the present application are novel and nonobvious with respect to the cited prior art which fails to disclose one or more limitations of the present invention. Claims 1 and 9 recite in relevant part: "...the security policy is defined for a security policy group comprising one or more *virtual private networks* having a *hierarchical organization*..." Clearly, the hierarchy refers to the relationship between the virtual private networks. As stated in the specification on page 3, lines 12-14, the purpose of the hierarchical organization of virtual private networks is to facilitate the creation of fully-meshed VPNs.

In contrast to the present invention, Examiner relies on Rowe in support of the rejection of the hierarchical organization of one or more claims. In particular, Examiner states on page 6, lines 13-15 of the April 2 office action:

"Rowe has taught a content management tool that provides a hierarchical arrangement of data tables ... and allowed users to access the system ..."

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Applicant respectfully asserts that Examiner's reliance on Rowe is misplaced because Rowe merely discloses the organization of information, but *not the organizational relationship* between virtual private networks within a *security policy group*. The mere organization of a *listing of networks* in a database is vastly different than the organizational precedence with which the networks are provided security privileges and other resources, for example, shared by the security policy group. Therefore claims 1 and 9 are both patently distinguishable from the prior art.

Claims 7-8 and 15-16 depend from claims 1 and 9, respectively, and are therefore also allowable.

#### C. CONCLUSION

Applicant submits that the present application is in condition for allowance and respectfully requests that a timely Notice of Allowance be issued in this case.

Should there be any fees for this action, your office is authorized to draw from the firm deposit account number 02-3979. Should you have any questions, or identify any problem, I would appreciate a telephone call so that this matter may be resolved promptly.

Respectfully submitted,

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